

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

MARYLAND SHALL ISSUE, INC., *et al.*,

Plaintiffs,

v.

LAWRENCE HOGAN, *et al.*,

Defendants.

Case No. 16-cv-3311-ELH

**CONSENT MOTION OF INTERNATIONAL LAW ENFORCEMENT
EDUCATORS AND TRAINERS ASSOCIATION, INTERNATIONAL
ASSOCIATION OF LAW ENFORCEMENT FIREARMS INSTRUCTORS,
PROFESSORS OF SECOND AMENDMENT LAW, SECOND AMENDMENT
FOUNDATION, CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND
BEAR ARMS, JEWS FOR THE PRESERVATION OF FIREARMS
OWNERSHIP, MILLENNIAL POLICY CENTER, & INDEPENDENCE
INSTITUTE FOR LEAVE TO FILE *AMICUS CURIAE* BRIEF IN
OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT
AND IN SUPPORT OF PLAINTIFFS' CROSS-MOTION FOR SUMMARY
JUDGMENT**

With the consent of all parties, the International Law Enforcement Educators and Trainers Association, International Association of Law Enforcement Firearms Instructors, Second Amendment Foundation, Citizens Committee for the Right to Keep and Bear Arms, Jews for the Preservation of Firearms Ownership, Millennial Policy Center, Independence Institute, and law professors Randy Barnett (Georgetown), Royce Barondes (Missouri), Robert Cottrol (George Washington),

Nicholas Johnson (Fordham), Donald Kilmer (Lincoln), Nelson Lund (George Mason), Joyce Malcolm (George Mason), George Mocsary (Southern Illinois), Joseph Olson (Mitchell Hamline), Glenn Reynolds (Tennessee), and Gregory Wallace (Campbell) respectfully move this Honorable Court for leave to file the attached *amicus curiae* brief in opposition to Defendants' Motion for Summary Judgment, and in support of Plaintiffs' Cross-Motion for Summary Judgment.

The interests and expertise of the organizational *amici* are described in the Statement of *Amici Curiae* in the brief, and the particular expertise of the law professors is described in Appendix II to the brief.

In short, the International Law Enforcement Educators and Trainers Association ("ILEETA") and the International Association of Law Enforcement Firearms Instructors ("IALEFI") are the leading professional associations in their fields. They are the experts who train the trainers. They wish to share with this Court why they believe that Maryland's rigid and unreasonable training rules are counterproductive, oppressive, and dangerous.

The law professors are leading scholars in Second Amendment law, and oft-cited by the Supreme Court and other courts. The think tanks and civil rights associations have an extensive record of historical and policy research, and of participation as *amici* in firearms law cases. They wish to assist this Court by putting the current Maryland statutes in the broader historical context of American gun control laws. They also seek to provide useful analysis of the statutes under modern doctrines.

All parties have consented to the filing of the brief.

For the reasons stated above, *Amici* respectfully request that leave be granted to file the accompanying brief.

Dated this 5th day of October 2018.

Respectfully submitted,

/s/ Gregory M. Kline
Counsel of Record

CERTIFICATE OF SERVICE

I hereby certify that on October 5, 2018, I served the foregoing motion via the CM/ECF system for the United States District Court for the District of Maryland, which will distribute the motion to all attorneys of record in this case. No privacy redactions were necessary.

Dated this 5th day of October 2018.

/s/ Gregory M. Kline
Counsel of Record